

Philip A. Goldstein
MC GUIREWOODS LLP
1251 Avenue of the Americas, 20th Floor
New York, New York 10020-1104
(212) 548-2167
pagoldstein@mguirewoods.com

Attorneys for Defendant The Guida-Seibert Dairy Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

----- X
TIFFANEE GOULD, individually and on : Case No. 1:22-cv-01861-NLH-AMD
behalf of her minor son, A.J., *et al.*, :
:
Plaintiffs, : **NOTICE OF MOTION FOR**
v. : **ADMISSION *PRO HAC VICE* OF**
: **JAMES F. NEALE**
:
THE GUIDA-SEIBERT DAIRY COMPANY, :
et al., : Motion Date: July 5, 2022
:
Defendants. :
----- X

PLEASE TAKE NOTICE that upon the annexed Certification of local counsel Philip A. Goldstein, the Certification of James F. Neale, and upon all prior pleadings and proceedings in this action, Defendant The Guida-Seibert Dairy Company (“Defendant”) shall move this Court before the Honorable Ann Marie Donio, U.S.M.J., at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Courtroom 3B, Camden, New Jersey 08101, on July 5, 2022, for an Order pursuant to Local Civil Rule 101.1(c) admitting James F. Neale *pro hac vice*, to participate before this Court in all proceedings in this action and in any related mediation or arbitration.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant shall rely upon the Certification of Philip A. Goldstein and the Certification of James F. Neale submitted herewith. A proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that counsel for Plaintiffs do not consent to this motion. Movant respectfully requests oral argument if an opposition to this motion is filed.

Dated: New York, New York
June 10, 2022

Respectfully submitted,

McGUIREWOODS LLP

By: /s/ Philip A. Goldstein

Philip A. Goldstein
McGUIREWOODS LLP
1251 Avenue of the Americas, 20th Floor
New York, New York 10020
Telephone: (212) 548-2167
Facsimile: (212) 548-2150
pagoldstein@mcguirewoods.com

Counsel for Defendant The Guida-Seibert Dairy Company